



NATIONAL
ASSOCIATION OF
COUNTY AND CITY
HEALTH OFFICIALS

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August 3, 1998

FEDERAL COMMUNICATIONS COMMISSION
Office of the Secretary
1919 M Street, NW, Room 222
Washington, DC 20554

Attn: Magalie Roman Salas

RE: USAC Plan of Reorganization
CC Docket Nos. 97-21 and 96-45
DA-98-1336

Dear Commissioners:

The National Association of County and City Health Officials (NACCHO) respectfully submits the following comments on the USAC Plan of Reorganization. We do so in the belief that the health of rural communities will benefit from enhanced access to telecommunications by rural public health departments.

We urge strongly that the composition of the proposed USAC governing board be modified to provide for substantial and meaningful participation by persons with pertinent experience in rural telehealth. As the proposal stands, only one of 18 members is designated to represent the perspective of rural health, while a seven-member Rural Health Care Advisory Committee comprising only members of the USAC board will advise on rural health matters.

Building effective rural telehealth systems requires full consideration of the perspective of the health organizations that will be using those systems. We believe, therefore, that rural health experts must have representation on the USAC governing board that is equivalent to the representation of other important constituencies served by universal service, such as schools and libraries. Furthermore, we believe that the Rural Health Care Advisory Committee should be composed entirely of persons with substantial knowledge and experience in telehealth and rural health care issues and systems. In order to accomplish this, it would be necessary to provide for participation on that Advisory Committee of persons who do not serve on the full USAC governing board. This is a reasonable course of action that would improve the capacity of the USAC board to serve rural health needs as efficiently and effectively as possible.

NACCHO is the national organization that represents the nation's local public health departments. There are about 3,000 local health departments nationwide. Forty-four percent of

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these health departments serve populations less than 25,000 and about two-thirds serve populations less than 50,000. Local health departments are charged with assuring the quality of the health systems in their areas and for assuring the health of the population. Providing all local health departments with access to telecommunications is critically important. For example, local health departments need to obtain instantaneous information regarding epidemics and imminent public health threats, such as food-borne disease or cases of highly infectious disease, in order to take prompt steps to protect the citizens in their jurisdictions. They need timely access to medical information and treatment protocols, which many can use in their own clinics and health centers.

Universal services can play an important role in building rural telehealth capacity, but that role must be informed by the views and experiences of those who are on the front lines in protecting and improving the health of rural communities. We urge that the USAC Plan of Reorganization be changed as recommended above and look forward to the Commission's favorable consideration of our comments.

Sincerely,

A handwritten signature in dark ink, appearing to read 'Tom Milne', with a stylized, flowing script.

Thomas L. Milne
Executive Director